

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
	)	
<b>v.</b>	)	<b>2:06-CR-218-MHT</b>
	)	
	)	
	)	
<b>GEORGE HOEY MORRIS,</b>	)	

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**MOTION FOR LEAVE TO FILE AMENDED OBJECTIONS  
TO DEFENDANT’S PRESENTENCE INVESTIGATION REPORT**

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**COMES NOW**, the Defendant, George Hoey Morris, by and through the undersigned counsel and files this Motion for Leave to File Amended Objections to Defendant’s Presentence Investigation Report in the above-styled case. As ground therefore, the Defendant would aver to this Honorable Court as follows:

1. On October 31, 2006, the jury returned a verdict of Guilty in the above-styled case. (Doc #32)
2. On November 2, 2006, the Court entered a CORRECTED ORDER wherein the parties were directed to “file any objections to the PSR by 12/28/2006”.
3. On December 14, 2006, the undersigned was placed on notice that the Defendant’s family had hired Susan G. James, Esquire to act as retained counsel for the Defendant for

sentencing and appeal. On December 15, 2006, Ms. James filed her Notice of Attorney Appearance. (Doc #37)

4. That new counsel for the Defendant filed her objections on January 12, 2007 with the United States Probation Office.

5. That on May 24, 2007 the undersigned was re-appointed to represent the Defendant for sentencing. (See Doc #67)

6. That the Defendant filed pro se on June 28, 2007 a Motion to Produce Document wherein the Defendant alleged to the court that he had not received a copy on the PSR in this case.

7. That the undersigned provided a copy of the amended PSR to the Defendant on June 28, 2007 and attempted to discuss the PSR with the Defendant.

8. That the Court held a hearing on July 10, 2007 wherein the Defendant acknowledged receipt of the amended PSR and further indicated that he had objections to the same.

9. That based on the representations of the Defendant, he was without the ability to file objections to the PSR as he had not received a copy prior to the date said objections were due; therefore, the Defendant would have been unable to make those objections known to his attorney of record, Susan G. James nor could he have filed pro se objections to the PSR.

10. That the Government would not be prejudiced by the granting of this motion.

**WHEREFORE, PREMISES CONSIDERED**, the Defendant, George Hoey Morris, prays this Honorable Court will (1) deem the objections filed by the Defendant's

previous attorney as being filed timely although outside the Court's original order, and  
(2) allow the Defendant to file additional objections to the PSR no later than July 17,  
2007.

**RESPECTFULLY SUBMITTED**, this the 16<sup>th</sup> day of July, 2007.

/s/ J. Carlton Taylor  
J. CARLTON TAYLOR (TAY058)  
ASB-5037-L53J  
Attorney for the Defendant

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**CERTIFICATE OF SERVICE**

I hereby certify that on this the 16<sup>th</sup> day of July, 2006, I electronically filed the foregoing  
Notice of Appeal with the Clerk of the Court using the CM/ECF system which will send  
notification of such filing to the following:

Susan Redmond, AUSA  
Todd Brown, AUSA  
John T. Harmon, AUSA  
Office of the U.S. Attorney  
Middle District of Alabama  
PO Box 197  
Montgomery AL 36101-0197

/s/ J. Carlton Taylor  
J. CARLTON TAYLOR (TAY058)  
ASB-5037-L53J  
Attorney for the Defendant